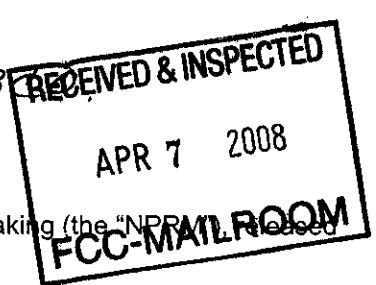


Save our Local Radio. W.B.

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**



I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM") released Jan. 24, 2008, in MB Docket No. 04-233.

Many of the proposals in NPRM, contrary to the FCC's stated objectives, would harm both localism and diversity of viewpoints.

The true wellsprings of localism and diversity are smaller market radio stations and stations offering specialized programming (including religion, foreign language, ethnic and alternative programming). These types of stations also serve as important gateways for new entrants seeking business opportunities in broadcasting – increasing ownership among those traditionally underrepresented.

But just as major operating costs are quickly rising, and more Americans are turning to new media, the NPRM proposes measures that would substantially raise costs – something that will be keenly felt among small market and specialized programming broadcasters. The rational economic response will be service cutbacks or outright shutdowns. Neither outcome is in the public interest.

One of these ill-advised proposals would force radio stations to curtail reliance on labor-saving technology. An end to unstaffed operations will not improve responsiveness to a local community. To the contrary, it will likely lead stations to broadcast fewer hours or shut down altogether. Unattended operation with proper safeguards has helped small stations provide more service through efficiency. Take that away, and the Commission will create strong disincentive for stations to stay on during the late evening or early morning hours, hours during which very little revenue is generated. The increased operational costs will lead new entrepreneurs, including women and minorities, to look elsewhere to invest their savings and sweat equity.

The Commission must also reject proposal that would further limit where broadcasters can locate their main studios. The Commission acted in the public interest when it adopted rules many years ago to permit stations greater flexibility in selecting the location of their main studios, particularly in situations in which a broadcaster operates stations licensed to several nearby communities. If the Commission were to force each station to establish its main studio only in that station's community of license, the result would be that broadcasters -- particularly small market and speciality programming broadcasters -- would have to divert their limited financial resources from supporting and enhancing quality programming to covering additional and unnecessary real estate costs.

The FCC should also jettison proposals forcing stations to give away airtime to community groups. One proposal would even enforce public access requirements, similar to cable PEG channels. Cable has dozens, even hundreds of channels from which it can profit, but smaller market radio and stations serving small specialized audiences do not. Free is not really free to those who struggle every day just to keep the electricity flowing, the programming going, and the local news covered.

Smaller stations are keenly attuned to the communities they serve – it is how they remain in business. But the balance is delicate, and the Commission must not take action that will tip the balance so stations cut back on service or drop out. There is no 'public interest' in service that is both diminished and less diverse.

Respectfully submitted,

Signature

Name

Title (if any)

Organization (if any)

To FCC - small is much better for informed local info, - to require small station to hire more people to work is foolish & unnecessary!

*Common sense in our Country is less & less.
DW*

Date

Address

Phone

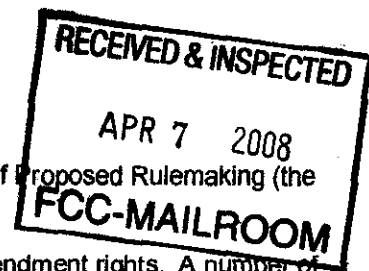
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806 S East St.

Bucyrus Oh 44820.

419 562 0716

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Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

Bahson

Signature

Date April - 1 - 08

Bahson P. Newsome

Name

5322 Happiness
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Bahson P. Newsome

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Title (if any)

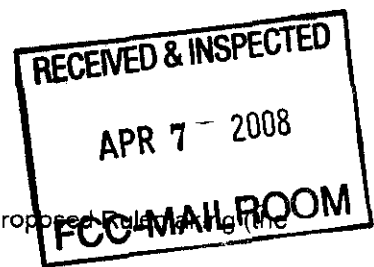
Member

Organization (if any)

Assembly of God

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We urge the FCC not to adopt rules, procedures or policies discussed above.

Bonita K. Craig

Signature

03/31/08
Date

BONITA K. CRAIG

Name

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Address

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CHRISTIAN
Title (if any)

EVANGELICAL
Organization (if any)



RESULT: Now, it is possible to serve several missions from one location. But under this proposal, many co-location arrangements would be forced to end – raising daily operating costs and imposing immediate expenses related to moving, construction of other facilities and overseeing forced relocations.

RESULT: When coupled with the rapidly rising costs of broadcasting, including multiplying electricity expenses, extended staffing requirements and forced relocations will leave some Christian Broadcasters with little choice: either cut back or give up.

The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it. Christian Radio needs your support now to keep its message of salvation strong on the nation's airwaves. It's not just a Christian thing – everyone's fundamental constitutional rights are at stake.

HERE'S WHAT YOU CAN DO:

The FCC is taking comments on these proposals. You can add your comments to the record. The FCC can only make rule changes based on evidence – and the evidence you submit can make a difference!

By Mail: Send a letter, specifying what the FCC must not do and why. Make sure you place the docket number on top of the letter to be sure it is delivered to the correct office:

MB Docket No. 04-233, Comments in Response to Localism Notice of Proposed Rulemaking.

Mail your comments, so they arrive by April 14, 2008 to

Using the US Postal Service:

The Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Attn: Chief, Media Bureau.

Or using FedEx, UPS, DHL or similar services:

The Secretary

Federal Communications Commission

9300 East Hampton Drive

Capitol Heights, MD 20743

Attn: Chief, Media Bureau

By Internet: Visit <http://www.savechristianradio.com> for easy step-by-step comment submission assistance.

You can also write to your Senators and Congressman. Tell them that freedom of religion and freedom of speech are threatened. Describe the problematic FCC proposals and the harm they will cause, if they are adopted. For help locating your Senators and Congressman – visit <http://www.savechristianradio.com>